



A COMMONWEALTH TELEPHONE  
ENTERPRISES COMPANY

February 6, 2006

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: CTSI, LLC.  
Certification of CPNI Filing (2-6-06)  
EB Docket No. 06-36  
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission rules concerning telecommunications carriers' protection of the privacy of customer proprietary network information ("CPNI"),<sup>2</sup> CTSI, LLC, submits the attached Compliance Statement and Certificate.

Respectfully submitted,

J. Christine Feeley  
Vice President of Marketing

cc: Bryon McCoy via e-mail: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

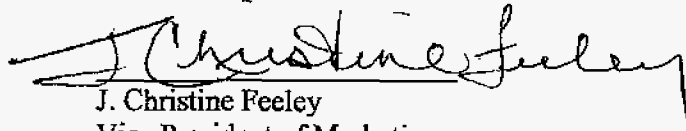
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<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

<sup>2</sup> 47 C.F.R. § 64.2001, *et seq.*

**CERTIFICATION OF CPNI COMPLIANCE - 2006**

I, J. Christine Feeley, hereby certify that I am an officer of CTSI, LLC, with the title of Vice President of Marketing, that I am authorized to execute this certification as an agent for CTSI, LLC; and that based upon my personal knowledge, I certify that CTSI, LLC has established operating procedures, as described in the accompanying statement, that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 64.2001 through 64.2009.

  
J. Christine Feeley  
Vice President of Marketing

Executed on: February 6, 2006

**CTSI, LLC ("CTSI")**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

CTSI is compliant with the FCC's Customer Proprietary Network Information rules and regulations. Specifically, CTSI's marketing practices conform to 47 CFR § 64.2005, "Use of Customer Proprietary Network Information Without Customer Approval," as the products and services marketed to existing CTSI customers are "among the categories of service" (i.e., local and/or interexchange) "to which the customer already subscribes from the same carrier" and customer approval is therefore not required. CTSI markets telecommunications and information services to its existing customers. In addition, at the initiation of every inbound or outbound telemarketing call, CTSI requests customer permission to access the account for marketing purposes.

CTSI does not share CPNI with its affiliates in marketing products and services to its customers. CTSI also does not sell or share its customer proprietary network information to suppliers, vendors or others for the purposes of marketing non-CTSI telecommunications or information services. The CTSI marketing department maintains records of all sales and marketing campaigns for a minimum of one year.

In December 2005, CTSI began marketing a satellite television product on behalf of a third party. CTSI does not use CPNI in the marketing of this product. This product was marketed to all CTSI customers without regard to individual CPNI.

When customers initiate contact with questions about products and services, CTSI representatives verify that the caller is the authorized customer on the account in question by confirming identity. The customer is then asked for permission to access the account records in order to appropriately address questions.

CTSI customer service representatives handling inbound or outbound telemarketing calls are trained on how to handle CPNI, and have written guidelines at their workstation as part of their "Call Guide." The training and guidelines both include the requirement that each customer service representative seek verbal permission to access customer account information from the customer of record on every inbound or outbound call.

CTSI has implemented policies that require its employees to protect the confidentiality of CPNI. The policies restrict access to customer records, provide for employee training concerning the authorized and unauthorized use of CPNI, and require the confidentiality of customer records and CPNI. These confidentiality provisions also are outlined in an Employee Code of Ethical Conduct and Employee Code of Criminal Conduct. All employees must verify in writing that they have reviewed, understand and will comply with these policies. Each CTSI employee must execute this document on an annual basis, evidencing that they have reviewed, understand and comply with these policies. In addition, a CPNI policy statement has been distributed to the CTSI marketing department to ensure compliance with the FCC's CPNI rules in marketing efforts. CTSI expects its employees and agents to act in accordance with all governing State and Federal laws, rules and regulations. As such, the Company has adopted policies, including the Code of

Ethical Conduct and the Code of Criminal Conduct, which address but are not limited to instances of employee dishonesty, theft, or unauthorized access and or use of private or confidential information contained in the records of a customer of the Company. Any CTSI employees that violate the Code of Ethical Conduct and/or the Code of Criminal Conduct, including violations for the unauthorized use, sharing or disclosure of CPNI will be subject to disciplinary action, including suspension and possible termination of employment.